

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**GRADY O. HUMPHREYS, et al., vs.
A.O. SMITH ELECTRICAL
PRODUCTS COMPANY, et al.**

THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

GRADY O. HUMPHREYS, et al.,

Plaintiffs,

vs.

**CIVIL ACTION NO.
2:07-CV-607-WKW**

ASBESTOS DEFENDANTS:

**A. O. SMITH ELECTRICAL PRODUCTS
COMPANY, a division of A.O. SMITH
CORPORATION, et al.,**

Defendants.

/

**JOINDER AND ADOPTION IN RAPID AMERICAN CORPORATION'S MOTION TO
DISMISS, OR IN THE ALTERNATIVE, MOTION TO SEVER AND
FOR MORE DEFINITE STATEMENT**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., Maremont Corporation and Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company) and hereby join in and adopt as though fully set forth Rapid American's Motion to Dismiss, or in the Alternative, Motion to Sever and For More Definite Statement filed herein on February 6, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., Maremont Corporation and Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company) respectfully request this Honorable Court to grant Rapid American's Motion to Dismiss, or in the Alternative, Motion to Sever and For More Definite Statement filed herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 18th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher
Evelyn M. Fletcher (FLE 019)
AL Bar No. ASB-1485-C19E
Elizabeth B. Padgett (PAD015)
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Counsel for Foseco, Inc., Maremont Corporation,
Union Carbide Corporation and Bayer
Cropscience, Inc.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.
Law Offices of G. Patterson Keahey, P.C.
One Independence Plaza, Suite 612
Birmingham, AL 35209

This 18th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher
Evelyn M. Fletcher (FLE019)
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